

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

LORDSTOWN MOTORS CORP., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

Jointly Administered

Re: Docket No. 82

**ORDER GRANTING KARMA AUTOMOTIVE LLC'S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

Upon consideration of *Karma Automotive LLC's Motion for Relief from the Automatic Stay* (the "Motion");² and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice need be provided; and after due deliberation thereon; and good and sufficient cause

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The automatic stay imposed under 11 U.S.C. § 362(a) of the Bankruptcy Code is modified to permit Karma to complete the District Court Case litigation through a jury verdict, judgment and post-trial motions against Debtor Lordstown Motors Corp.
3. The fourteen (14) day stay provision of Rule 4001(a)(3) of the Federal Rules of Bankruptcy Procedure is hereby waived, and this Order shall become effective immediately.
4. This Court retains jurisdiction to enforce this Order, including with respect to all disputes and all other matters arising from or related to the implementation or interpretation of this Order.